

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

Universal Property & Casualty Insurance Company)
 a/s/o Marguerite Williams and a/s/o Charlesetta Lacy)
 (File #: 2023-0137))
 Plaintiff,)

CIVIL ACTION FILE #:

v.)

23-C-05300-S5

Best Buy Stores, L.P. and)
 John Doe Delivery Service)
 Defendants)

COMPLAINT FOR TORT OF NEGLIGENCE

1. Defendant is a corporation with a registered agent for service of process located in this county.
2. Prior to May 16, 2022, Plaintiff's Insured, Charlesetta Lacy, purchased a Washing Machine for her property at 149 Druid Circle, Savannah, GA 31410 from Defendant Best Buy Stores, L.P.
3. The Washing Machine was to be delivered to Plaintiff's Insured's property at 149 Druid Circle Savannah, GA 31410 and installed pursuant to Delivery # 1122077715374.
4. The Washing Machine was delivered by John Doe Delivery Service retained by Defendant Best Buy Stores, L.P. and they attempted to install the washing machine but were unable to do so.
5. Unbeknown to Plaintiff's Insureds, John Doe Delivery Service did not shut off the water to the home after removing the washing machine and prior to leaving the premises.
6. Subsequently, the water continued to run for an extended period of time while unoccupied resulting in **\$89,785.81** in property damages.
7. The negligence of one or both Defendants was the sole proximate cause of the **\$89,785.81** in property damages.

8. Plaintiff is subrogated to all rights and interest in the claim against Defendant as a result of making payments to or on behalf of Plaintiff's Insured under a policy of insurance.

WHEREFORE, Plaintiff demands judgment against Defendant in the sum of **\$89,785.81** plus the legal rate of pre-judgment interest, costs and the legal rate post-judgment interest.

Respectfully Submitted this 28 day of July, 2023.

/s/Ronald Lockley

Ronald Lockley
Ronald J. Lockley P.C.
3605 Sandy Plains Road, Suite 240-409
Marietta, GA 30066
Georgia State Bar Number 455560

Email: rjl@lockleylaw.com
File #: 2023-0137
Phone Number (404)425-2643